

**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

<b>UNITED STATES OF AMERICA</b>	)	
	)	
<b>v.</b>	)	<b>No. 3:20-cr-00165</b>
	)	<b>Judge Campbell</b>
	)	
<b>CALEB D. JORDAN</b>	)	

**UNOPPOSED MOTION TO CONTINUE TRIAL  
AND PRETRIAL DEADLINES**

Caleb Jordan, through undersigned counsel, hereby moves this Honorable Court to continue the trial and to extend the pretrial deadlines. In support of this Motion, undersigned counsel would show the Court the following:

1. The trial is set to commence on May 18, 2021.
2. Mr. Jordan is charged with seven counts of production of child pornography, in violation of 18 U.S.C. §§ 2251(a) and (e) (Counts 1-7); extortion, in violation of 18 U.S.C. § 875(b) (Count 8); distribution of child pornography, in violation of 18 U.S.C. § 2252A(a)(2)(A) (Count 9); and possession of child pornography, in violation of 18 U.S.C. § 2252A(5)(b) (Count 10). If convicted as charged in the indictment, Mr. Jordan faces a minimum of 15 years imprisonment, up to, should consecutive sentencing be imposed, an effective sentence of life imprisonment.
3. The discovery in this case is voluminous. It includes materials seized by the government from multiple electronic devices and thousands of pages of communications from multiple web-based accounts. Production by the government has been slow, apparently due to various technical issues, including the need to produce materials in a format which redacts alleged contraband images so that the defense can receive and examine the written communications. There remains a substantial

portion that has not yet been provided to the defense. Counsel for the parties, along with their respective computer forensics experts, are working diligently to resolve the issues impeding the completion of the government's production and the defense's review of the materials, but much remains to be accomplished before this case can be prepared for presentation at trial or otherwise resolved.

4. Mr. Jordan requests a continuance so that his counsel can obtain and analyze all of the discovery materials, complete her investigation of the government's case and defenses thereto, and prepare for trial. Without a continuance of the trial date and an extension of the pretrial deadlines, undersigned counsel will be unable to provide Mr. Jordan with effective assistance of counsel as guaranteed by the Sixth Amendment to the United States Constitution.

5. Mr. Jordan's Speedy Trial Waiver is not submitted herewith because the signed copy has not yet arrived in the mail from the jail in which the defendant is detained pretrial. It will be filed as soon as counsel receives it. Even without the written waiver, however, this motion can be granted based on an ends-of-justice determination.

6. Undersigned counsel has conferred with AUSA Carrie Daughtrey regarding the need for a continuance of the trial. She indicated she has no objection.

7. Undersigned counsel requests a continuance until a date no earlier than December 2021. This period of time is requested based in part on the quantum of work that remains to be completed and in part on undersigned counsel's trial schedule. A continuance will serve the interests of justice for both the defendant and the public.

Respectfully submitted,

s/Kathleen G. Morris

Kathleen G. Morris

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**Certificate of Service**

I hereby certify that I filed this document through the Court's electronic filing system which generated a notification thereof to Assistant United States Attorney Carrie Daughtrey, 110 Ninth Avenue South, Suite A-961, this 4<sup>th</sup> day of May, 2021.

s/Kathleen G. Morris

Kathleen G. Morris